

SUBMISSION ON PROPOSED WAIMAKARIRI DISTRICT PLAN

Date: 17 December 2021

To: Proposed District Plan Submission
Waimakariri District Council
Private Bag 1005, Rangiora 7440

Submission lodged by email: developmentplanning@wmk.govt.nz

Name of person making submission: Ngāi Tahu Property

This is a submission in support of: the Proposed Waimakariri District Plan

Ngāi Tahu Property **could not** gain an advantage in trade competition through this submission.

Ngāi Tahu Property **wishes** to be heard in support of its submission

If others make a similar submission, Ngāi Tahu Property **will** consider presenting a joint case with them at a hearing.

As a late submission Ngāi Tahu Property seeks that the Council use the powers available to them under Section 37 (1)(b) of the Resource Management Act (**RMA**) to waive time limits imposed under the Act for the purposes of the lodgement of submissions, and accept this submission as a late submission by Ngāi Tahu Property. Ngāi Tahu Property acknowledges that the submission is 15 working days late, however, also notes that:

- A summary of submissions has not yet been publicised, and
- That the further submission period has not yet opened.

As a result waiving the time limit for this submission will not prejudice or directly affect other parties.

1. Ngāi Tahu Property

1.1 These submissions are made on behalf of Ngāi Tahu Property. Ngāi Tahu Property is a wholly owned subsidiary of Ngāi Tahu Holdings Corporation (**NTHC**), the commercial arm of Te Rūnanga o Ngāi Tahu (**Te Rūnanga**), the governing body and iwi authority overseeing the activities of Ngāi Tahu.

1.2 NTHC manages the financial assets of Ngāi Tahu and includes subsidiary groups: Ngāi Tahu Property, Ngāi Tahu Seafood, Ngāi Tahu Tourism, Ngāi Tahu Capital, Ngāi Tahu Farming, Ngāi Tahu Forestry and Oha Honey; together these are the investment pillars of Ngāi Tahu tribal economic development.

1.3 Ngāi Tahu Property operate under the whakataukī: mō kā uri ā muri ake nei - for us and our descendants after us. Our mission is to create wealth for Ngāi Tahu whānui and to do so in a way that is sensitive to te ao tūroa. We are active in property investment, management and development throughout the Ngāi Tahu takiwā and in Tāmaki Makaurau.

2. Relief Sought - General

2.1 Ngāi Tahu Property generally supports the plan provisions except where we ask for specific amendments or additions as set out in **Schedule One** attached.

3. Reasons - General

3.1 The amendments and additions sought to this plan by Ngāi Tahu Property are to better incorporate the broader interests and aspirations of Ngāi Tahu Property in the Waimakariri District and in turn to support the economic, social, cultural and environmental needs of Ngāi Tahu whānui and the community more generally. These changes are necessary to:

- Better achieve the purpose of the RMA, particularly in enabling people and communities to provide for their social, economic, environmental and cultural well-being; and
- Consequently, discharge the council's duties under Section 32 of the RMA.

3.2 These reasons apply to every decision requested in this submission, along with any additional specific reasons listed under each submission point in **Schedule One**.



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Proposed Waimakariri District Plan

Ngāi Tahu Property Submission, Schedule 1

| <p><i>The specific provisions of the proposal that my submission relates to are:</i></p> | <p><i>I support or oppose the specific provisions or wish to have them amended.</i></p> | <p><i>The reasons for my views are:</i></p> | <p><i>I seek the following decision from the local authority, including any consequential amendments required: (amendments are shown in strike through and bold underline)</i></p> |
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| <p>SD – O1 Natural Environment</p> <p>Across the District:</p> <ol style="list-style-type: none"> 1. there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity; 2. the natural character of the coastal environment, freshwater bodies and wetlands is preserved or enhanced, or restored where degradation has occurred; 3. outstanding natural features and outstanding natural landscapes are identified and their values recognised and protected; 4. people have access to a network of natural areas for open space and recreation, conservation and education, including within riparian areas, the coastal environment, the western ranges, and within urban environments; and 5. land and water resources are managed through an integrated approach which recognises the importance of ki uta ki tai to Ngāi Tahu and the wider community, and the inter-relationships between ecosystems, natural processes and with freshwater. | <p>Support</p> | <p>Sets out appropriate direction for natural environment values.</p> | <p>Retain</p> |
| <p>SD- O2 Urban Development</p> <p>Urban development and infrastructure that:</p> <ol style="list-style-type: none"> 1. is consolidated and integrated with the urban environment; 2. that recognises existing character, amenity values, and is attractive and functional to residents, businesses and visitors; | <p>Support with amendments</p> | <p>The Strategic Direction focusses urban development in existing centres which in principle is supported. However, there may be instances where this is not possible, and as such some allowance for this is sought in the Strategic Direction.</p> | <p>Amend as follows:</p> <p>SD- O2 Urban Development</p> <p>Urban development and infrastructure that:</p> |

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| <ol style="list-style-type: none"> 3. utilises the District Council's reticulated wastewater system, and potable water supply and stormwater infrastructure where available; 4. provides a range of housing opportunities, focusing new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in <u>UFD-O1</u>; 5. supports a hierarchy of urban centres, with the District's main centres in Rangiora, Kaiapoi, Oxford and Woodend being: <ol style="list-style-type: none"> a. the primary centres for community facilities; b. the primary focus for retail, office and other commercial activity; and c. the focus around which residential development and intensification can occur. 6. provides opportunities for business activities to establish and prosper within a network of business and industrial areas zoned appropriate to their type and scale of activity and which support district self-sufficiency; 7. provides people with access to a network of spaces within urban environments for open space and recreation; 8. supports the transition of the Special Purpose Zone (Kāinga Nohoanga) to a unique mixture of urban and rural activities reflecting the aspirations of Te Ngāi Tūāhuriri Rūnanga; 9. provides limited opportunities for Large Lot Residential development in identified areas, subject to adequate infrastructure; and 10. recognise and support Ngāi Tūāhuriri cultural values through the protection of sites and areas of significance to Māori identified in <u>SASM-SCHED1</u>. | | | <ol style="list-style-type: none"> 1. <u>as far as possible</u> is consolidated and integrated with the urban environment; ... 4. provides a range of housing opportunities, <u>and where possible</u> focusing<u>es</u> new residential activity within existing towns, and identified development areas in Rangiora and Kaiapoi, in order to achieve the housing bottom lines in <u>UFD-O1</u>; |
| <p>SD – O4 Rural Land</p> <p>Outside of identified residential development areas and the Special Purpose Zone (Kāinga Nohoanga), rural land is managed to ensure that it remains available for productive rural activities by:</p> <ol style="list-style-type: none"> 1. providing for rural production activities, activities that directly support rural production activities and activities reliant on the natural resources of Rural Zones and limit other activities; and | <p>Support with amendments</p> | <p>As per the above while the principle is supported, there may be instances where other uses for rural land must be considered. Amendments are sought to provide for this consideration.</p> | <p>Amend as follows:</p> <p>SD – O4 Rural Land</p> <p>Outside of identified residential development areas and the Special Purpose Zone (Kāinga Nohoanga), rural land is managed</p> |

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| <p>2. ensuring that within rural areas the establishment and operation of rural production activities are not limited by new incompatible sensitive activities.</p> | | | <p>to ensure that it remains available for productive rural activities by:</p> <ol style="list-style-type: none"> 1. primarily providing for rural production activities, activities that directly support rural production activities and activities reliant on the natural resources of Rural Zones and limit other activities; and 2. ensuring that within rural areas the establishment and operation of rural production activities are not limited by new incompatible sensitive activities. |
| <p>UFD-P1 Density of residential development</p> <p>In relation to the density of residential development:</p> <ol style="list-style-type: none"> 1. provide for intensification in urban environments through provision for minor residential units, retirement villages, papakāinga or suitable up-zoning of Residential Zones where it is consistent with the anticipated built form and purpose of the zone; 2. locate any Medium Density Residential Zone so it: <ol style="list-style-type: none"> a. supports, and has ready access to, existing Commercial and Mixed Use Zones, schools, public transport and open space; b. supports well connected walkable communities; c. avoids or mitigates natural hazard risk in any high hazard area within existing urban areas; and d. located away from any Heavy Industrial Zone. | Support | <p>This policy appropriately provides for increased densities where appropriate and suitable up-zoning.</p> | <p>Retain as notified.</p> |
| <p>UFD-P2 Identification/location of new Residential Development Areas</p> <p>In relation to the identification/location of residential development areas:</p> | Support with amendments | <p>In the future it may be necessary to identify additional Residential Development Areas to those identified in the proposed plan. This</p> | <p>Amend as follows:</p> <p>...</p> |

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| <ol style="list-style-type: none"> 1. residential development in the new Residential Development Areas at Kaiapoi, North East Rangiora, South East Rangiora and West Rangiora is located to implement the urban form identified in the Future Development Strategy; 2. for new Residential Development Areas, other than those identified by (1) above, avoid residential development unless located so that they: <ol style="list-style-type: none"> a. occur in a form that concentrates, or are attached to, an existing urban environment and promotes a coordinated pattern of development; b. occur in a manner that makes use of existing and planned transport and three waters infrastructure, or where such infrastructure is not available, upgrades, funds and builds infrastructure as required; c. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; d. concentrate higher density residential housing in locations focusing on activity nodes such as key activity centres, schools, public transport routes and open space; e. take into account the need to provide for intensification of residential development while maintaining appropriate levels of amenity values on surrounding sites and streetscapes; f. are informed through the development of an ODP; g. supports reductions in greenhouse gas emissions; and h. are resilient to natural hazards and the likely current and future effects of climate change as identified in SD-O6. | | <p>may be due to the availability of developable land and/or the feasibility of land. A policy to anticipate the need for new or expanded existing residential development areas is appropriate.</p> | <p>2, for new Residential Development Areas, other than those identified by (1) above, <u>avoid manage the effects of</u> residential development unless located so that they:</p> |
| <p>UFD-P5 Identification/location and extension on Industrial Zones</p> <p>Provide for the extension of existing Industrial Zones and locate and develop new industrial activities to implement the urban form identified in the Future Development Strategy or WDDs.</p> | Support | It is appropriate to provide for the extension of existing industrial zones for future development. | Retain as notified. |
| <p>UFD-P8 Mechanism to provide additional Industrial Zones</p> <p>If proposed, ensure any plan change to create new, or expanded existing Industrial Zones:</p> <ol style="list-style-type: none"> 1. manages adverse effects at the interface between Industrial Zones and arterial roads, Rural Zones, Residential Zones and Open Space and Recreation Zones, through methods such as building setbacks and landscaping; | Support | <p>There may be instances where industrial development needs to be located outside of Industrial Zones identified in the proposed plan. This may be due to the availability of developable land and/or the feasibility of land. A policy to anticipate the need for new or</p> | <p>Retain with amendment:</p> <p>Amend sub clause 3 as follows:</p> <ol style="list-style-type: none"> 3. <u>where possible</u> locates new Industrial Zones in locations adjacent to existing urban environments where it |

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| <ol style="list-style-type: none"> 2. provides for development of greenfield areas in a manner aligned with the delivery of infrastructure, including upgrades to infrastructure, to avoid adverse effects on the capacity and efficiency of infrastructure serving these areas; and 3. locates new Industrial Zones in locations adjacent to existing urban environments where it can be efficiently serviced by infrastructure. 4. is informed through the development of an ODP. | | <p>expanded existing industrial zones is appropriate.</p> | <p>can be efficiently serviced by infrastructure.</p> |
| <p>RESZ-P1 Design of development</p> <p>New development in residential areas is well designed and laid out, including by:</p> <ol style="list-style-type: none"> 1. ensuring that the bulk, scale and location of buildings on sites is consistent with the environment anticipated for the zone, and that impacts in relation to dominance, privacy and shadowing are minimised, while recognising the ability for larger sites in the General Residential Zone and Medium Density Residential Zone to absorb greater height; 2. ensuring that the combination of buildings, paved surface, and landscaped permeable surface coverage retain a landscaped component for residential sites and provide opportunity for on-site stormwater infiltration, and where this is reduced that it is offset by suitable planting, other green surface treatment, and stormwater attenuation; 3. maintaining streetscapes in Residential Zones where garaging and buildings are set back from the street, and where these setbacks are reduced, that sufficient space is still available for vehicle manoeuvring and impacts of dominance on the streetscape are minimised; 4. facilitating passive surveillance and active residential frontages through controls on glazing, avoidance of blank facades, provision of habitable rooms and front door entrances to residential units facing the street, and consider modification of those controls only where other active design features such as verandas are incorporated; 5. minimising the adverse impact of high fences on streetscape character and public safety; and 6. ensuring that residential activities are provided with sufficient on-site outdoor living space for residents through access to outdoor | <p>Support with amendments</p> | <p>The design principles are generally supported but, in some cases, too prescriptive and do not provide for circumstances where these approaches will not be possible and/or appropriate.</p> | <p>Amend as follows:</p> <p>...</p> <ol style="list-style-type: none"> 2. ensuring that the combination of buildings, paved surface, and landscaped permeable surface coverage retain a landscaped component for residential sites and provide opportunity for on-site stormwater infiltration where possible, and where this is reduced that it is offset, for example by suitable planting, other green surface treatment, and/or stormwater attenuation; ... 4. facilitating passive surveillance and active residential frontages where practicable through controls on glazing, avoidance of blank facades, provision of habitable rooms and front door entrances |

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| living space that is complements the housing typology, or where not directly provided, take into account alternative arrangements for open space (either within the site or within close proximity to the site). | | | to residential units facing the street, and consider modification of those controls only where other active design features such as verandas are incorporated; |
| <p>RESZ-P14 Development density</p> <p>Development densities for new Development Areas and Large Lot Residential Zone Overlays shall be as follows:</p> <ol style="list-style-type: none"> 1. in new Development Areas, achieve a minimum net density of 15 households per ha averaged across the whole of the residential Development Area within the relevant ODP, unless there are demonstrated constraints then no less than 12 households per ha. 2. in new Large Lot Residential Zone Overlays, achieve a net density of 1 to 2 households per ha. | Support in part | In a development of sufficient scale the densities proposed are appropriate and achievable. At a smaller scale it can be more challenging to achieve. | <p>Amend as follows:</p> <ol style="list-style-type: none"> 1. in new Development Areas, <u>where possible</u> achieve a minimum net density of 15 households per ha averaged across the whole of the residential Development Area within the relevant ODP, unless there are demonstrated constraints then no less than 12 households per ha. 2. in new Large Lot Residential Zone Overlays, achieve a net density of 1 to 2 households per ha <u>where possible.</u> |
| <p>GRZ-O1 General Residential Zone</p> <p>A general suburban residential zone with a range of larger site sizes providing for predominantly residential use.</p> | Support | It is appropriate to have a residential zone that provides for a broad range of residential site sizes that caters to the needs and demands of the community. | Retain as notified. |
| <p>GRZ-P1 Residential character and amenity values</p> <p>Provide for activities and structures that support and maintain the character and amenity values anticipated for the zone which:</p> | Support | This policy enables some appropriate mixed-use activities and a range of densities that are typical of a general residential zone. | Retain as notified. |

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| <ol style="list-style-type: none"> 1. provides for suburban character on larger sites primarily with detached residential units; 2. provides for a pleasant residential environment, in particular minimising the adverse effects of night time noise, glare and light spill, and limited signs; 3. provides opportunities for multi-unit residential development on larger sites; 4. has sites generally dominated by landscaped areas, with open spacious streetscapes; 5. through careful design provides a range of higher density living choices to be developed within the zone; and 6. provides for small scale commercial activity that services the local community, and home businesses at a scale consistent with surrounding residential character and amenity values. | | | |
| GRZ-P2 General Residential Zone Overlay For any General Residential Zone Overlay, ensure an ODP is developed in accordance with SUB-P6 and incorporated into the District Plan. | Support | Appropriately provides for an Outline Development Plan, discussed further below. | Retain as notified. |
| General Residential Zone Rules | Generally support subject to two comments below. | Appropriately implements policies. However, some non-compliances with standards trigger a non-complying status that would inappropriately hinder development. | Retain as notified, subject to GRZ-BFS1 Site density and GRZ-BFS2 Building coverage (discussed below). |
| GRZ-BFS1 Site density <ol style="list-style-type: none"> 1. Site density shall be a maximum of one residential unit per 500m² of net site area, which can be calculated over multiple adjacent sites. 2. Where a site is less than 500m², one residential unit is allowed. 3. This rule does not apply to any minor residential unit, or residential unit in a retirement village. Activity status when compliance not achieved: NC | Support with amendments | <p>The ability to calculate site density over multiple adjacent sites is supported, however a maximum of one residential unit per 500m² of net site area is too restrictive.</p> <p>In addition, a non-compliance with this rule should not trigger a non-complying activity status. A minor non-compliance may lead to an otherwise permitted or controlled activity jumping to a non-complying status, providing an inappropriately high bar relative to the activity.</p> | Amend as follows: <ol style="list-style-type: none"> 1. Site density shall be a maximum of one residential unit per 5400m² of net site area, which can be calculated over multiple adjacent sites. 2. Where a site is less than 5400m², one residential unit is allowed. 3. This rule does not apply to any minor residential |

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| | | | unit, or residential unit in a retirement village. Activity status when compliance not achieved: NG DIS |
| GRZ-BFS2 Building coverage 1. Building coverage shall be a maximum of 45% of the net site area, except that this rule shall not apply to: <ol style="list-style-type: none"> any infrastructure building; any caravan; or deck under 1m in height above ground level. Activity status when compliance not achieved: DIS | Support with amendments | A maximum building coverage of 45% is not high enough for the General Residential Zone and does not adequately provide for the range of housing types that is anticipated within this zone. | Amend as follows: 1. Building coverage shall be a maximum of 45 70 % of the net site area ... |
| MRZ-O1 Provision of medium density housing A higher density suburban residential zone located close to amenities with a range of housing typologies providing for predominantly residential use. | Support | This zone appropriately provides for increased residential density near amenities and enables a flexible approach that will allow for a range of housing types to meet the needs and demands of the community. | Retain as notified. |
| MRZ-P1 Residential character Provide for activities and structures that support and maintain the character and amenity values anticipated for the zone, which provides for: <ol style="list-style-type: none"> higher density living in areas with better access for walking to parks, main centres or local commercial centres; multi-unit redevelopment opportunities through flexible development controls and encouragement for multi-site redevelopment; high quality building and landscape design for multi-unit residential development with appropriate streetscape landscaping and positive contribution to streetscape character; provides for a peaceful residential environment, in particular minimising the adverse effects of night time noise and outdoor lighting, and limited signs; appropriate internal amenity within sites; a mix of detached, semi-detached and multi-unit living; small-scale commercial, or community-based activities, that service the local community, and home businesses; and | Support | The flexible development controls will enable this zone to provide for a range of activities and housing typologies. | Retain as notified. |

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| 8. a wider range of home business-based commercial activity in the Residential Commercial Precinct adjacent to Rangiora Town Centre. | | | |
| Medium Density Housing Rules | Support | Appropriately implements policies. In particular, provides for a discretionary activity status for most non-compliances with standards. | Retain as notified. |
| INZ P1 – Anticipated activities in Industrial Zones Provide for a range of industrial activities to occur in identified industrial zones, including providing for the following activities: <ol style="list-style-type: none"> 1. small scale ancillary offices where these are necessary to support a primary activity anticipated in industrial zones; 2. small scale ancillary retail that is necessary to support a primary activity anticipated in industrial zones and is limited to the sale of products manufactured or processed on site; 3. warehousing, yard-based activities, and trade suppliers outside of the Heavy Industrial Zone; 4. emergency services or non-custodial community corrections facilities outside of the Heavy Industrial Zone; 5. small-scale cafés and dairies that are primarily supporting the needs of workers and businesses in the Light and General Industrial Zone; and 6. community activities in the Light and General Industrial zones where these are compatible with the role and function of the zone, and do not result in a shortfall of Light and General Industrial land. | Support | Provides for flexibility of industrial use while clarifying what non-industrial activity can be anticipated. | Retain as notified. |
| LIZ-O1 Provision of light industrial activities Light industrial and space intensive commercial activities are enabled where the adverse effects of these activities within the zone and on adjacent non-industrial zones results in an acceptable level of amenity values. | Support | Provides appropriate guidance on where light industrial may be suitable. | Retain as notified. |
| LIZ – P1 Compatible effects | Support | Provides appropriate direction on the location of light industrial activities. | Retain as notified. |

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| Recognise and provide for light industrial and other compatible activities that can operate in close proximity to, and provide a buffer for, more sensitive zones due to their hours of operation and nature and limited effects of activities including noise, signs, odour, and traffic. | | | |
| LIZ – P2 Amenity effects Adverse amenity effects within the zone, and on the amenity values of neighbouring zones are managed. | Support | Appropriate to manage effects of light industrial. | Retain as notified. |
| Light Industrial Rules | Support | Appropriately implement policies | Retain as notified. |
| GIZ – O1 Provision of general industrial activities Provide for general industrial activities where the adverse effects of these activities on adjacent non-industrial zones are managed at the interface to provide an acceptable level of amenity in these more sensitive zones. | Support | Sets out appropriate expectations for the general industrial zone. | Retain as notified. |
| GIZ – P1 Activities Recognise and provide for a range of general industrial and other compatible activities and avoid activities which do not support the primary function of the zone. | Support | Provides a commonsense approach to the general industrial zone | Retain as notified. |
| GIZ – P2 Amenity effects Adverse amenity effects within the zone, and on the amenity values of neighbouring zones are managed. | Support | It is appropriate to manage adverse effects within the zone and on amenity values of neighbouring zones | Retain as notified. |
| General Industrial Rules | Support | Appropriately implement policies | Retain as notified. |
| HIZ – O1 Provision of heavy industrial activities | Support | As per the above it is appropriate to manage adverse effects of heavy industrial activities. | Retain as notified. |

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| Heavy industrial activities are enabled where the adverse effects of these activities on adjacent non-heavy industrial zones are managed at the interface to provide an acceptable level of amenity in these more sensitive zones. | | | |
| HIZ – P1 Heavy industrial activities Recognise and provide for heavy industrial activities that generate potentially significant and continuous effects, including relatively high levels of noise, odour, heavy traffic movements, and the presence of significant amounts of hazardous substances, necessitating separation from more sensitive activities and the consideration of reverse sensitivity management. | Support | The policy appropriately provides for heavy industrial activities that potentially generate significant and ongoing effects. | Retain as notified. |
| Heavy Industrial Zone – rules Earthworks Standards: Table EW1 – General standards for earthworks 1,000m ³ is provided for over a 12 month period per site in industrial zones (subject to standards being met around sediment control, slope etc) | Support | Appropriately implement policies | Retain as notified. |
| SUB – P6 Criteria for Outline Development Plans Ensure that new Residential Development Areas, new Large Lot Residential Zones, new Commercial and Mixed Use Zones and new Industrial Zones shall not be subdivided until an ODP for that area has been included in the District Plan and each ODP shall: <ol style="list-style-type: none"> 1. be prepared as a single plan; and 2. be prepared in accordance with the following: <ol style="list-style-type: none"> a. identify principal roads, connections and integration with the surrounding road networks, relevant infrastructure and areas for possible future development; b. any land to be set aside: <ol style="list-style-type: none"> i. for community facilities or schools; ii. parks and land required for recreation or reserves; iii. for business activities; iv. the distribution of different residential densities; | Support with amendments | For the most part this sets out considerations which are appropriate for an Outline Development Plan. As discussed above, in a development of sufficient scale the densities proposed are appropriate and achievable. At a smaller scale it can be more challenging to achieve. Ngāi Tahu Property are concerned that the criteria for ODP's should remain straight forward so as to not create unnecessary delays. Timeliness of the provision of ODP's is essential to the efficient delivery of development in the District. | Amend as follows: c. for new Residential Development Areas demonstrate how each ODP area will achieve a minimum net density of at least 15 lots or households per ha <u>where possible</u> , unless there are demonstrated constraints then no less than 12 households per ha <u>where possible</u> ; |

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| <p>v. for the integrated management of water systems, including stormwater treatment, secondary flow paths, retention and drainage paths;</p> <p>vi. from development for environmental or landscape protection or enhancement; and</p> <p>vii. from development for any other reason, and the reasons for its protection.</p> <p>c. for new Residential Development Areas demonstrate how each ODP area will achieve a minimum net density of at least 15 lots or households per ha, unless there are demonstrated constraints then no less than 12 households per ha;</p> <p>d. identify any cultural, natural, and historic heritage features and values and show how they are to be enhanced or maintained;</p> <p>e. indicate how required infrastructure will be provided and how it will be funded;</p> <p>f. set out the phasing and co-ordination of subdivision and development;</p> <p>g. demonstrate how effective provision is made for a range of transport options, including public transport systems, pedestrian walkways and cycleways, both within and adjoining the ODP area;</p> <p>h. for new Residential Development Areas, demonstrate how open space, playgrounds or parks for recreation will be provided within a 500m radius of new residential allotments including:</p> <p>i. transport connectivity for active, public and other transport modes;</p> <p>ii. connection to any other open space or community facility and other zones; and</p> <p>iii. potential use of open space for stormwater management;</p> <p>i. show how other potential adverse effects on and/or from nearby existing or designated strategic infrastructure (including requirements for designations, or planned infrastructure) will be avoided, remedied or appropriately mitigated;</p> <p>j. show how other potential adverse effects on the environment, the protection and enhancement of surface and groundwater quality, are to be avoided, remedied or mitigated;</p> <p>k. include any other information which is relevant to an understanding of the development and its proposed zoning; and</p> <p>l. demonstrate that the design will minimise any reverse sensitivity effects.</p> | | | |
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| <p>SUB – R10 Subdivision in the General Rural Zone</p> <p>Activity status: NC Where: 1. subdivision creates an allotment with a minimum allotment area less than 20ha, except where a subdivision takes place to accommodate infrastructure.</p> | Oppose | A non-complying activity status creates a difficult consenting pathway for subdivision in the General Rural zone. There may be instances where subdivision is appropriate, and as such a Discretionary activity status is more appropriate | Amend from Non-Complying activity to Discretionary. |
| <p>SUB – S3 Residential Yield 1. Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone, shall provide for a minimum net density of 15 households per ha, unless there are demonstrated constraints then no less than 12 households per ha.</p> <p>Activity status when compliance not achieved – Non-Complying</p> | Support with amendments | <p>As above in a development of sufficient scale the densities proposed are appropriate and achievable. At a smaller scale it can be more challenging to achieve.</p> <p>A non-complying activity status for non-compliance is an inappropriately high bar which may hinder the flexibility required to deliver housing projects within the district.</p> | <p>Amend as follows: 1. Residential subdivision of any area subject to an ODP, except in the Large Lot Residential Zone, shall provide for a minimum net density of 15 households per ha <u>where possible</u>, unless there are demonstrated constraints then no less than 12 households per ha <u>where possible</u>.</p> <p>Amend from Non-Complying activity to Discretionary.</p> |